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Attorney for Mario Sanchez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
MARIO SANCHEZ,)
)
Defendant.)

2:15-cr-00213-JAD-NJK

**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, MARIO SANCHEZ, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the Sentencing in the above-captioned matter currently set for Monday, January 8, 2018 be re-set for at least 30 days.

This Stipulation is entered into for the following reasons

1. Mr. Leventhal will be out of jurisdiction and will not be available.
2. Mr. Sanchez has been compliant with all requirements of Pre-Trial services and has been in constant communication with his attorney.
3. Mr. Sanchez is currently out of custody and agrees with this request.
4. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States Attorney, and she has no objection to this continuance.

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1 5. Additionally, denial of this request for a continuance could result in a miscarriage
2 of justice.

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4 DATED this 5th day of January, 2018.

5
6 /s/ Todd M. Leventhal
7 TODD M. LEVENTHAL, ESQ.
8 Counsel for Mario Sanchez

/s/ Susan Cushman
 SUSAN CUSHMAN
 Assistant U.S. Attorney

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10 Submitted By: LEVENTHAL & ASSOCIATES, PLLC

11
12 By: /s/ Todd M. Leventhal
13 TODD M. LEVENTHAL, ESQ.
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)	2:15-cr-00213-JAD-NJK
Plaintiff,)	
)	
vs.)	
)	
MARIO SANCHEZ,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Mr. Leventhal will be out of jurisdiction and will not be available.
2. Mr. Sanchez has been compliant with all requirements of Pre-Trial services and has been in constant communication with his attorney.
3. Mr. Sanchez is currently out of custody and agrees with this request.
4. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States Attorney, and she has no objection to this continuance.
5. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

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1 **CONCLUSIONS OF LAW**

- 2 1. For all the above-stated reasons, the ends of justice would be best served by granting
3 a continuance of the current Sentencing and Disposition Hearing and reset it for a
4 time after February 5, 2018.
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6 **ORDER**

7 Accordingly, IT IS SO ORDERED that the current Sentencing setting is vacated and
8 the same is continued and reset for February 20, 2018 at 9:00 a.m.

9
10 DATED: 1/8/2018

11 
12 JENNIFER A. DORSEY
13 UNITED STATES DISTRICT JUDGE

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on the 5th day of January, 2018 a true and correct copy of the,

16 **STIPULATION AND ORDER TO CONTINUE SENTENCING**

17 was filed through the CM/ECF filing system and was electronically served to the following
18 registered addresses on file for this instant case :
19
20

21 Susan Cushman: susan.cushman@usdoj.gov, Christie.M.Sequeira@usdoj.gov,
22 USANV.team3@usdoj.gov, caseview.ecf@usdoj.gov, denise.cope@usdoj.gov
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24

25 /s/ Todd M. Leventhal
26 An Employee of TODD M. LEVENTHAL, ESQ.
27 LEVENTHAL AND ASSOCIATES, PLLC.
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